

Exhibit 2

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

BENJAMIN W. PILLARS, as
Personal Representative for the
Estate of KATHLEEN ANN PILLARS,
Deceased,

Plaintiff,

Honorable Thomas J. Ludington
Case: 1:15-cv-11360-TLL-PTM

v.

GENERAL MOTORS LLC,

Defendant.

Victor J. Mastromarco, Jr. (P35464)
Russell C. Babcock (P57662)
The Mastromarco Firm
Attorneys for Plaintiff
1024 N. Michigan Avenue
Saginaw, MI 48602
989.752.1414 / 989.752.6202 fx
Vmastromar@aol.com
russellbabcock@aol.com

Thomas P. Branigan (P41774)
Elizabeth A. Favaro (P69610)
Bowman and Brooke LLP
Attorneys for Defendant
41000 Woodward Avenue, Suite 200 East
Bloomfield Hills, MI 48304
248.205.3300 ph / 248.205.3399 fx
tom.branigan@bowmanandbrooke.com
elizabeth.favaro@bowmanandbrooke.com

**DEFENDANT GENERAL MOTORS LLC'S RESPONSE TO PLAINTIFF'S
MOTION TO SUPPLEMENT PLAINTIFF'S RESPONSE TO
DEFENDANT'S MOTION FOR LEAVE TO FILE AMENDED NOTICE OF
REMOVAL AND AMENDED ANSWER**

Defendant, General Motors LLC ("GM LLC"), responds to Plaintiff's Motion to Supplement his Response to GM LLC's Motion for Leave to File Amended Notice of Removal and Amended Answer (the Motion) as follows:

As a preliminary matter, Plaintiff's Counsel's claim that concurrence in the Motion was sought in compliance with LR 7.1 is incomplete and inaccurate. The Motion was filed by Plaintiff's Counsel less than three hours after leaving an early morning voicemail for Defense Counsel. See *Little Caesar Enterprises, Inc. v. Divine Commercial Enterprises, Inc.*, No. 11-13163, 2011 WL 3235475 (E.D. Mich. July 28, 2011) (If a conference was not possible, then the counsel for the movant must certify that "despite reasonable effort specified in the motion or request, the movant was unable to conduct a conference."). Here, there was no urgency to Plaintiff's submission and its filing without speaking to opposing counsel and without giving him a reasonable opportunity to respond to Plaintiff's Counsel's voicemail is not consistent with the requirements of LR 7.1 or a good faith effort to seek concurrence.

Regardless of Plaintiff's Counsel's failure to comply with LR 7.1, GM LLC's Motion to is *sub judice* and GM LLC does not object to supplementing the record with the Bankruptcy Court's July 29, 2015 Order, which merely memorializes that court's July 16 bench ruling and attaches a corrected transcript of the hearing that took place on that date. The hearing transcript was previously provided to this Court on July 21, 2015

and nothing in the Order impacts any of the arguments previously made by the parties and already submitted to the Court for consideration in connection with GM LLC's Motion to Amend.

The Bankruptcy Court's Order also does not address and has no impact on the Judicial Panel on Multidistrict Litigation's ("JPML's") consideration of this case for transfer to MDL No. 2543 for coordinated or consolidated proceedings. The JPML is scheduled to take the issue up without argument at its hearing on July 30, 2015 and is expected to issue a decision within the next two-three weeks.

Respectfully submitted,

Bowman and Brooke LLP

By: /s/Thomas P. Branigan
Thomas P. Branigan (P41774)
Elizabeth A. Favaro (P69610)
Attorneys for Defendant
41000 Woodward Avenue
Suite 200 East
Bloomfield Hills, MI 48304
248.205.3300 ph / 248.205.3399 fx
tom.branigan@bowmanandbrooke.com
elizabeth.favaro@bowmanandbrooke.com

CERTIFICATE OF SERVICE

I certify that on July 30, 2015, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to the following:

Victor J. Mastromarco, Jr. (P35464)
Russell C. Babcock (P57662)
The Mastromarco Firm
Attorneys for Plaintiff
1024 N. Michigan Avenue
Saginaw, MI 48602
989.752.1414 / 989.752.6202 fx
Vmastromar@aol.com
russellbabcock@aol.com

Bowman and Brooke LLP

By: /s/Thomas P. Branigan
Thomas P. Branigan (P41774)
Elizabeth A. Favaro (P69610)
Attorneys for Defendant
41000 Woodward Avenue
Suite 200 East
Bloomfield Hills, MI 48304
248.205.3300 ph / 248.205.3399 fx
tom.branigan@bowmanandbrooke.com
elizabeth.favaro@bowmanandbrooke.com